

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
:

UNITED STATES OF AMERICA

:

- v. -

:

SUPERSEDING
INFORMATION

BORIS YUSUPOV,

:

S4 11 Cr. 614 (VM)

Defendant.

:

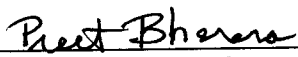
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COUNT ONE

The United States Attorney charges:

From in or about December 2010, up to and including on or about November 30, 2011, in the Southern District of New York and elsewhere, BORIS YUSUPOV, the defendant, intentionally and knowingly did engage in a pattern and practice of hiring and recruiting and referring for a fee, for employment in the United States aliens knowing the aliens were unauthorized aliens, as defined in Title 18, United States Code, Section 1324a(h)(3), with respect to such employment, and, after hiring aliens for employment, intentionally and knowingly continued to employ the aliens in the United States knowing the aliens were (or had become) unauthorized aliens with respect to such employment, and did aid and abet such pattern and practice, to wit, BORIS YUSUPOV, the defendant, transported aliens who were hired by another individual to strip clubs where the aliens worked as exotic dancers, knowing the aliens to be unauthorized aliens with respect to that employment.

(Title 8, United States Code, Sections 1324a(a)(1), (a)(2),
(f)(1), and Title 18, United States Code, Section 2.)



PREET BHARARA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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(8 U.S.C. §§ 1324a(a)(1)(A), 1324a(a)(2),
1324a(f)(1), 18 U.S.C. § 2)

PREET BHARARA

United States Attorney.

3/21/13

Old Superseding Info AUSA Jonathan Cohen
pres. Def. Boris Yusupov per w/other
Lou. Aidala Def. Old Court to
Proceed but the Def. pleads Guilty
to CT #1 Bail Court

May Judge Polgar